IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: SOCLEAN, INC. MARKETING, SALES PRACTICES AND PRODUCTS LIABILITY LITIGATION))) Master Docket: No. 22-mc-152
This document relates to:) MDL No. 3021
SoClean, Inc. v. Koninklijke Philips N.V., et al., 2:22-cv-542	(Oral Argument Requested)
)

DEFENDANTS' MOTION TO DISMISS SOCLEAN'S SECOND AMENDED COMPLAINT UNDER RULE 12(b)(1) FOR LACK OF SUBJECT MATTER JURISDICTION

Pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure, Defendants Philips RS North America LLC, Koninklijke Philips N.V., and Philips North America LLC (collectively, "Defendants"), through their undersigned counsel, respectfully move this Court for entry of an order dismissing Plaintiff SoClean, Inc.'s Second Amended Complaint (ECF No. 211; the "SAC") in its entirety for lack of subject matter jurisdiction.

WHEREFORE, for the reasons set forth in the accompanying Memoranda of Law and accompanying exhibits, Defendants respectfully request that the Court enter an order (a) granting the Motion, (b) dismissing all counts in the Complaint, and (c) granting such other and further relief as the Court deems just and appropriate.

Defendants request oral argument on the Motion.

Dated: November 18, 2022 Respectfully submitted,

/s/ John P. Lavelle, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on November 18, 2022.

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